

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

TELEBRANDS CORPORATION,)	Case No. 1:23-cv-00631-BMB
)	
Plaintiff,)	Judge Bridget Meehan Brennan
)	
v.)	
)	
WINSTON PRODUCTS LLC,)	
)	
Defendant.)	

**DEFENDANT WINSTON PRODUCTS LLC'S
RESPONSES TO PLAINTIFF'S FIRST SET OF INTERROGATORIES**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Defendant Winston Products LLC ("Winston"), by and through its undersigned counsel, responds to Plaintiff Telebrands Corporation's ("Plaintiff" or "Telebrands") First Set of Interrogatories as follows:

INTRODUCTORY STATEMENT

Winston's investigation into this matter is ongoing, and discovery in this case has just begun. Winston's responses are therefore limited by its current understanding of the facts in this case. Winston expressly reserves the right to supplement its responses to Plaintiff's First Set of Interrogatories in accordance with Fed. R. Civ. P. 26(e), and the objections set forth herein are made without prejudice to Winston's right to assert any additional or supplemental objections pursuant to Fed. R. Civ. P. 26(e).

Winston makes the following objections to each definition and instruction in Plaintiff's First Set of Interrogatories to Winston. These objections are hereby incorporated into each specific response. The assertion of the same, similar, or additional objections or partial responses to individual interrogatories does not waive any of Winston's objections to each definition and instruction.

INTERROGATORY NO. 1:

Identify all model names and numbers that Winston has used to identify or refer to each Accused Product.

RESPONSE:

Winston hereby identifies the following base model names and numbers regarding the Accused Products:

1. Model Name: Expandable Burst Proof Hose, 5/8" diameter – Blue
Model Number: 8988
2. Model Name: Expandable Burst Proof Hose, 5/8" diameter – Green
Model Number: 8989
3. Model Name: Expandable Burst Proof Hose, 5/8" diameter – Orange
Model Number: 8990
4. Model Name: Expandable Burst Proof Hose, 5/8" diameter – Yellow
Model Number: 8991
5. Model Name: Expandable Burst Proof Hose, 5/8" diameter – Red
Model Number: 8997
6. Model Name: Pro Series Max-Flow Hose, 3/4" x 50'
Model Number: 5558
7. Model Name: Pro Series Expandable Burst Proof Hose, 3/4" x 75'
Model Number: 5593
8. Model Name: Pro Series Max-Flow Hose, 3/4" x 100'
Model Number: 5560

9. Model Name: Pro Series Max-Flow Hose, 3/4" x 200'

Model Number: 5505

10. Model Name: 5/8" x 25' Expandable Burst Proof Hose – Blue

Model Number: 8988C4

11. Model Name: 5/8" x 75' Expandable Burst Proof Hose – Orange

Model Number: 8990C3

12. Model Name: 5/8" x 100' Expandable Burst Proof Hose – Yellow

Model Number: 8991C3

13. Model Name: 5/8" x 50' Expandable Burst Proof Hose – Green

Model Number: 8989C3

14. Model Name: 5/8" x 50' Expandable Burst Proof Hose – Green

Model Number: 5489C4

15. Model Name: 5/8" x 75' Expandable Burst Proof Hose – Orange

Model Number: 5490C4

16. Model Name: 5/8" x 100' Expandable Burst Proof Hose – Yellow

Model Number: 5491C4

17. Model Name: 5/8" x 25' Expandable Burst Proof Hose – Blue

Model Number: 8988C9

18. Model Name: Pro Series 3/4" x 50' Expandable Max Flow Hose – Green

Model Number: 5558C3

19. Model Name: Pro Series 3/4" x 100' Expandable Max Flow Hose – Yellow

Model Number: 5560C3

20. Model Name: Pro Series 3/4" x 75' Expandable Max Flow Hose – Orange

Model Number: 5593C3

21. Model Name: Pro Series 3/4" x 200' Expandable Max Flow Hose - Red

Model Number: 5595C3

22. Model Name: 5/8" x 100' Expandable Burst Proof Hose - Yellow

Model Number: 6091C4

23. Model Name: 5/8" x 200' Expandable Burst Proof Hose- Red

Model Number: 8997C3

24. Model Name: 5/8" x 200' Expandable Burst Proof Hose- Red

Model Number: 8995

25. Model Name: 5/8" x 75' Expandable Burst Proof Hose - Orange

Model Number: 6090C4

26. Model Name: 5/8" x 50' Expandable Burst Proof Hose - Green - 40 pc Stack Out

Model Number: 8989SO4

INTERROGATORY NO. 2:

Identify each model name and number that Winston has used to identify or refer to each product offered for sale or sold by Winston with each Accused Product, such as, for example, if a nozzle or sprayer was sold together with an Accused Product.

RESPONSE:

Winston objects that this interrogatory is overly broad and not sufficiently tailored to the issues in dispute. Specifically, the inclusion of *all* products "offered for sale or sold by Winston with each Accused Product," is beyond the scope of the litigation and not relevant to any claim or defense in the litigation.

VERIFICATION

I, _____, declare as follows:

I have read Defendant Winston Products LLC's Responses to Plaintiff Telebrands Corporations' First Set of Interrogatories. I am authorized to sign the Responses on behalf of Defendant Winston Products LLC. Based on information and belief, I believe the above answers are true and correct, subject to Defendant's right to supplement its discovery responses should it learn of additional responsive information.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this ___ day of _____ 2023.

By: _____

As to objections:

Dated: December 14, 2023

By: /s/Nicholas Clifford
Nicholas Clifford (*pro hac vice*)
TUCKER ELLIS LLP
100 South Fourth Street – Suite 600
St. Louis, MO 63102-1822
Telephone: 314-256-2550
Facsimile: 314.256.2549
Nicholas.Clifford@tuckerellis.com

Jeffrey C. Sindelar Jr. (0084252)
TUCKER ELLIS LLP
950 Main Avenue – Suite 1100
Cleveland, OH 44113-7213
Telephone: 216.592.5000
Facsimile: 216.592.5009
Jeffrey.Sindelar@tuckerellis.com

Attorneys for Defendant Winston Products LLC

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b)(2)(E), the foregoing was served via email on
December 14, 2023, upon:

David B. Cupar
McDONALD HOPKINS
600 Superior Avenue East, Suite 2100
Cleveland, Ohio 44114
Telephone: (216) 348-5400
dcupar@mcdonaldhopkins.com

Michael J. Zinna (admitted *Pro Hac Vice*)
Vincent M. Ferraro (admitted *Pro Hac Vice*)
KELLEY DRYE & WARREN LLP
3 World Trade Center
New York, New York 10007
Telephone: (212) 808-7800
Facsimile: (212) 808-7897
mzinna@kelleydrye.com
vferraro@kelleydrye.com

Counsel for Plaintiff Telebrands Corporation

/s/ Nicholas Clifford
*One of the attorneys for Defendant Winston
Products LLC*